

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

v.

MATTHEW CONNOLLY AND  
GAVIN BLACK,

*Defendants.*

No. 16-cr-370 (CM)

**MOTION FOR CURCIO HEARING**

The United States hereby moves the Court, for the reasons stated in the accompanying memorandum of law, to hold a hearing pursuant to *United States v. Curcio*, 680 F.2d 881 (2d Cir. 1982), to resolve actual and potential conflicts of interest that arise from Kenneth Breen's and Paul Hastings LLP's representation of defendant Matthew Connolly and their representation of Morgan Stanley.

Dated: June 23, 2017

Respectfully submitted,

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Acting Chief, Fraud Section  
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